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8 *Attorneys for Plaintiff*
9 and the alleged Class

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 **NEIGHBORHOOD NEUROPATHY**
13 **CENTER OF RENO LLC,**
14 individually and on behalf of all others
15 similarly situated,

16 Plaintiff,

17 v.

18 **MEDRISK LLC**

19 Defendant.

Case No. 3:19-cv-00619-LRH-WGC

20 **RENEWED JOINT PROPOSED**
21 **DISCOVERY PLAN AND**
22 **REQUEST FOR NEW**
23 **SCHEDULING ORDER**

24 Plaintiff Neighborhood Neuropathy Center of Reno LLC (“Plaintiff”) and
25 Defendant MedRisk LLC (“Defendant” or “MedRisk”) jointly submit this Renewed
26 Joint Proposed Discovery Plan and Request for New Scheduling Order. The Court
27 recently denied, on January 6, 2021, Defendant’s Motion for Summary Judgment,
28 which was filed approximately one month after the initial Discovery Hearing was
held in this case. (*See* Dkts. 19, 20, 26.) The Parties have subsequently met-and-
conferred and jointly submit the following proposed case schedule now that the
Motion for Summary Judgment has been denied:

Discovery Cut-off: August 23, 2021

Initial Expert Disclosure/Reports: June 23, 2021

1 Rebuttal Expert Disclosure/Reports: July 23, 2021

2 Motion for Class Certification: September 23, 2021

3 Subsequent Case Management Conference: TBD, to be set after a ruling on
4 class certification. The Parties propose that a subsequent case management
5 conference be set after a decision is made on class certification to establish
6 deadlines for the remainder of the case, including dispositive motions, pre-trial, and
7 trial.¹

8
9 Respectfully submitted,

10 Dated: January 22, 2021

11 **Neighborhood Neuropathy Center of Reno**
12 **LLC**, individually and on behalf of all others
13 similarly situated,

14 By: /s/ Taylor T. Smith
15 One of Plaintiff's Attorneys

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25 ¹ Defendant reserves all rights to move to limit the scope of discovery, and/or to bifurcate class
26 and merits discovery. Defendant will meet and confer with Plaintiff prior to requesting any such
27 relief from the Court.

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Attorneys for Plaintiff and the Class

* Pro Hac Vice

Dated: January 22, 2021

MedRisk, LLC

By: /s/ Joel E. Tasca
One of Defendant's Attorneys

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IT IS SO ORDERED



UNITED STATES MAGISTRATE JUDGE

DATED: January 25, 2021